

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MANUEL STAPLETON,

Plaintiff,

Case No. 13-cv-11848  
Hon. Stephen J. Murphy III

vs.

CITY OF MELVINDALE,  
OFFICER BRIAN BROWNING,  
BADGE #ME037,

Defendants.

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GREG LIEPSHUTZ (P37573)  
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**PLAINTIFFS' WITNESS LIST**

**NOW COMES** Plaintiff, MANUEL STAPLETON, by and through his attorneys,  
GREG M. LIEPSHUTZ and LEVINE BENJAMIN, P.C., who submits his Witness List  
that sets forth the following:

**LAY WITNESSES:**

1. Manuel Stapleton - 17994 Ruth Street, Melvindale, MI 48122
2. Officer Brian Browning

**EXPERT WITNESSES:**

2. Any and all employees, agents, independent contractors, and keepers of records of Melvindale Police Department with information pertaining to this matter, including but not limited to:
  - a. Officer R. Hinojosa
  - b. Officer B. Browning
  - c. Officer J. Bajorek
  - d. Officer J. Miller
  - e. Chief Chad Hayes
3. Any and all employees, agents, independent contractors, and keepers of records of Wayne County Sheriff's Department with information pertaining to this matter, including but not limited to:
4. Any and all employees, agents, independent contractors, and keepers of records of Park Urgent Care, 15101 Southfield Road, Allen Park, MI 48101 with information pertaining to this matter.

**OTHER WITNESSES:**

5. Any and all persons mentioned in answers to Interrogatories as well as those mentioned in depositions.
6. Any and all witnesses, including experts, listed by all other parties to this action.
7. All necessary rebuttal witnesses.
8. All witnesses including experts that are unknown at the present time but will become known during the course of discovery.
9. Any and all names in medical records which are at this time undecipherable.
10. All persons listed on Defendant's Witness Lists and/or any Supplemental Witness Lists filed by the Defendant.

11. Any and all employees or agents of any and all Witnesses listed above.
12. Plaintiff reserves the right to supplement his witness list as witnesses becomes known through the course of discovery of this matter, or the need for additional expert witnesses becomes known through the course of discovery in this matter.

Respectfully submitted,

LEVINE BENJAMIN, P.C.

/s/ GREG M. LIEPSHUTZ (P37573)  
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Dated: August 13, 2013

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following: Audrey J. Forbush, Esq., and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: None

/s/ Suzanne M. McCarrey  
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